

Responsible business policy

We recognise the importance of our role in managing social, economic and environmental issues. Responsible business is the principal way we seek to coordinate and manage practices to maximise positive social and economic contribution and minimise our environmental impact. Engagement with key clients, employees, our local community, environmental stakeholders, regulators, business partners, suppliers and our shareholders is central to our responsible business approach.

We divide responsible business into four segments:

Marketplace: How we work with our customers and suppliers

Workplace: Where we work, how we recruit and how we work with our employees

Environment: How we reduce our environmental impact

Community: How we engage with our local community

This policy is related to and builds upon the values and standards of ethical outlined in our code of business conduct.

Objectives

The objectives of this policy statement are:

- Clarify roles and responsibilities in respect of responsible business
- Outline the commitment and requirements for the responsible business segments of marketplace, workplace, environment and community

Scope

This policy applies to all our divisions (including their business units and service lines).

Policy requirements

Ownership of responsible business: The UK Executive Committee is accountable for responsible business in the UK. The coordination of responsible business initiatives and activities will be owned on the committee's behalf by the nominated committee member who will report regularly on responsible business status, progress and issues to the committee.

Executive management: Responsible for ensuring that key strategic and operational decisions in their area take into account responsible business considerations, supporting responsible business initiatives and practices through role-modelling and the allocation of sufficient resources, raising the profile of responsible business and overseeing that their area complies with this policy.

Employees: Responsible for adhering to this policy and enabling us to make a positive social, economic, and environmental contribution.

Marketplace

We will operate in accordance with the values and standards of behaviour set out in our code of business conduct and all applicable laws and regulatory requirements, and provide a mechanism and process whereby illegal and/or unethical behaviour can be reported and addressed.

We will provide products and services to meet the needs of our clients, while having consideration for the impact on the natural environment and communities where we



operate.

We will provide high standards of service to clients, and have complaints procedures for clients to ensure their concerns are efficiently addressed on those occasions where there is a problem.

We will take a partnership approach to supply chain relations, as outlined in our supplier code of conduct, ensuring that payments are made promptly, supplier complaints are reviewed, and that we use fair and transparent procurement methods.

We will use our position in the marketplace to raise awareness of responsible business with clients and the market, and help facilitate change to minimise impact on the natural environment and communities where we operate.

Workplace

We will provide a workplace in which diversity is valued and there are equal opportunities. We will provide a mechanism by which employees can raise their views and be engaged in change and issues that affect the company.

We will provide a safe and secure workplace which is conducive to the health and welfare of employees.

We will support employees with learning and development opportunities to help them reach their potential and maximise their contribution to our strategy.

We will recognise and reward individuals on the basis of their own performance and that of the company. We will appraise performance on both the results that were achieved and how they were achieved.

Environment

We will seek to minimise our energy, water and paper usage through design, infrastructure and behaviour.

We will seek to optimise the recycling of waste through providing adequate facilities and behaviour, and limit the use of hazardous material.

We will seek to reduce unnecessary travel and encourage the use of alternative means of communication where practical.

We will incorporate environmental considerations into our procurement decisions (including refurbishments/new building projects), and raise awareness/influence our supply chain to facilitate a reduction in their environmental impact.

Community

We will provide benefit to the community through the creation of jobs and the accompanying wealth produced, and through the investment of our money and time in the community.

We will provide and support UK-wide employee volunteering opportunities and support corporate fundraising campaigns.

We will encourage and support employees in their own community activities and fundraising efforts, through the provision of time and/or financial contribution.



We will encourage and facilitate employee giving by providing a Give-As-You-Earn (GAYE) facility.

Definitions

The following summarises key terms used in this policy statement.

- *Code of business conduct*: Sets out the standards of ethical behaviour required of all employees and officers, as well as our directors and agents whenever they are acting on behalf of the company.
- *Responsible business*: The overall approach we take to contribute to economic development while improving the quality of life of the workforce and their families as well as of the local community at large.

